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General Services Administration Public Buildings Service Washington, DC 20405

Executive Registry 86-1724X

APR | 6 1986

Dear Mr. Casey:

60-2

We have recently completed our special review of the General Services Administration (GSA) policy and Public Building Service (PBS) program for controlling and abating polychlorinated biphenyls (PCBs) and asbestos in GSA-controlled Federal buildings and leased space.

Enclosure A states the basic PBS policy regarding PCBs and outlines the approach we will take in implementing this policy. We have programmed the removal or retrofill of all PCB equipment in accordance with Environmental Protection Agency (EPA) regulations. This program is already in the design phase in our regional offices. The actual work is scheduled to be performed during fiscal years 1986, 1987, 1988 and 1989.

Retrofill will be performed only where it is deemed by engineering and cost analysis to be the permanent solution to bring the equipment to non-PCB status as defined by EPA regulations (below 50 parts per million), and it is the most cost-effective long-term solution. Retrofill must have the specific approval of GSA Central Office.

In certain cases, transformers and PCB equipment are <u>located</u> in GSA-controlled Federal buildings and leased spaced but are owned by private utility companies or lessors. All such locations have been surveyed; PCB equipment inventoried; and utility companies or lessors contacted regarding their plans to replace or retrofill. PBS will monitor their progress and attempt to obtain early completion. However, in such situations, under EPA regulations, they will have until October 1, 1990, to comply.

Enclosure B outlines GSA's policy with regard to asbestos control and abatement. The policy covers activities of PBS, Federal Supply Service, and Federal Property Resources Service. The "Implementing Approach" will give you an overview of how we are carrying out our asbestos control and abatement policy.

We currently have identified 45 high priority projects estimated to cost in excess of \$289 million. Twenty-two of these projects have been completed with the balance scheduled for completion by the end of fiscal year 1992. In addition, other buildings have projects identified which are in various stages of completion. These projects represent an estimated cost of over \$53 million and are scheduled to be completed by the end of fiscal year 1991.

As you can see from the approach outlined in Enclosure B, we are pursuing an aggressive program of asbestos control and abatement which includes Government-owned and -leased space. We will continually monitor all space and take prompt action to adequately control and abate asbestos conditions which may arise.

It is the policy of GSA to provide safe and healthful space, facilities and products to all customer agencies. Your continued comments and suggestions are invited and your support and cooperation is appreciated.

Sincerely,

WILLIAM F. SULLIVAN

Rill Sulling

Commissioner

The Honorable
William J. Casey
Director
Central Intelligence Agency
Washington, DC 20505

Enclosures

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GENERAL SERVICES ADMINISTRATION

POLYCHLORINATED BIPHENYLS (PCB) POLICY

It is the policy of the General Services Administration (GSA) to eliminate the hazard associated with polychlorinated biphenyls (PCBs)

IMPLEMENTING APPROACH

The preferred method to accomplish this policy is by replacing existing PCB equipment; however, retrofill may be used if it will bring PCB equipment to permanent non-PCB status and engineering, cost and risk analysis establish retrofill to be the best alternative. This will be done on a building-by-building basis and applies to all PCB fluids, equipment not permanently sealed, containers, and waste in GSA controlled space. GSA has strengthened and updated operating procedures and has implemented an accelerated abatement plan which devotes primary management attention and priority funding to the PCB program.

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GSA ASBESTOS POLICY

STATEMENI

IT IS THE POLICY OF THE GENERAL SERVICES ADMINISTRATION (GSA) TO ELIMINATE THE HAZARD ASSOCIATED WITH ASBESTOS IN GSA—CONTROLLED SPACE. GSA WILL COMPLY WITH APPLICABLE REGULATIONS OF THE ÚCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA). THE ENVIRONMENTAL PROTECTION AGENCY (EPA), AND THE DEPARTMENT OF TRANSPORTATION (DOT).

IMPLEMENTING APPROACH

GSA WILL GENERALLY FOLLOW THE PROCEDURES OUTLINED BELOW IN CARRYING OUT THE ABOVE STATED POLICY.

PBS

- O GSA WILL NOT INTRODUCE ANY NEW SPACE CONTAINING ASBESTOS INTO ITS GOVERNMENT-OWNED INVENTORY THRU PURCHASE, TRANSFER, EXCHANGE OR CONSTRUCTION.
- O NO NEW CONTROLLED ASBESTOS CONTAINING PRODUCTS OR MATERIALS WILL BE INTRODUCED IN GSA-OWNED BUILDINGS THRU ALTERATIONS OR REPAIRS.
- O ALL EXISTING BUILDINGS AND LEASED SPACE ARE BEING SURVEYED, ASBESTOS CONTAINING MATERIALS (ACM) INVENTORIED, INSPECTED AND/OR TESTED FOR CONDITION, AND AIR MONITORING CONDUCTED WHERE REQUIRED.
- O SPECIAL OPERATING, MAINTENANCE, REPAIR, ALTERATION AND ACCESS PROCEDURES ARE BEING ESTABLISHED AS REQUIRED.
- O POTENTIALLY HAZARDOUS (FRIABLE) ACM IS BEING EXPEDITIOUSLY REMOVED. ENCLOSED OR ENCAPSULATED.
- O EXISTING NON-FRIABLE ACM MAY BE PRESENT IF IN GOUD CONDITION AND CONTROLLED PER ESTABLISHED REGULATIONS AND MONITURED.
- O ANY RETAINED EXISTING NON-FRIABLE ACM WILL BE REMOVED DURING NORMAL REPAIR AND ALTERATION WORK.

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NEW LEASED SPACE

- O GSA WILL AVOID WHERE AT ALL POSSIBLE ACQUIRING NEW LEASED SPACE WITH ACM.
- O IF LEASED SPACE MUST BE ACQUIRED WITH ACM, FRIABLE MATERIALS WILL BE REMOVED. ENCAPSULATED OR ENCLOSED AT LESSOR EXPENSE PRIOR TO OCCUPANCY.
- O NON-FRIABLE MATERIALS MAY BE PRESENT IF IN GOOD CONDITION AND MONITORED PER EPA GUIDELINES.

EXISTING LEASED SPACE

- O INSPECTIONS OF LEASED SPACE ARE BEING MADE TO IDENTIFY ACM. AND CERTIFICATIONS OBTAINED FROM LESSORS.
- O IF FRIABLE ACM CONDITIONS ARE FOUND. THE ACM WILL BE EXPEDITIOUSLY REMOVED. ENCAPSULATED OR ENCLOSED AND AIR MONITORING CONDUCTED. IF THIS IS NOT POSSIBLE, AN EXPEDITIOUS RELOCATION WILL BE PURSUED.
- O NON-FRIABLE MATERIALS MAY BE PRESENT IF IN GOOD CONDITION AND MONITORED PER EPA GUIDELINES.
- O NO SUPPLEMENTAL LEASE, EXTENSION, OR SUCCEEDING LEASE WILL BE EXECUTED FOR SPACE WITH FRIABLE ACM UNLESS IT IS REMOVED, ENCAPSULATED, OR ENCLOSED AND POST ABATEMENT AIR MONITORING WITH AN INSPECTION PLAN IS DEVELOPED. IF SHORT TERM EXTENSION IS ABSULUTELY NECESSARY, EPA PROCEDURES PERTAINING TO FRIABLE ASBESTOS MUST BE IMPLEMENTED.

FSS

- O FSS OPERATED DISTRIBUTION FACILITIES WILL NOT RECEIVE. STORE OR SHIP ASBESTOS CONTAINING PRODUCTS.
- NO ASBESTOS CONTAINING PRODUCTS WILL BE PROCURED EXCEPT SPECIAL ORDER PRODUCTS IN A SOLID MATRIX FORM (NON-FRIABLE) OR PRODUCTS IN WHICH PRESENTLY NO ASBESTOS FREE SUBSTITUTE EXISTS.

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- O TRANSFER OF EXCESS OR SURPLUS ASBESTOS CONTAINING PRODUCTS WILL BE RESTRICTED TO PRODUCTS IN A SOLID MATRIX FURM (NON-FRIABLE) AND IN A CONDITION WHICH PRECLUDES RELEASE OF ASBESTOS FIBERS.
- O IF A SITUATION SHOULD ARISE WHERE NON-FRIABLE ASBESTOS PRODUCTS BECOME FRIABLE. THEY ARE DISPOSED OF IN ACCORDANCE WITH EPA REGULATIONS.

FPRS

- O NO EXCESS REAL PROPERTY WHICH DOES NOT COMPLY WITH EPA REGULATIONS ON FRIABLE ASBESTOS WILL BE ACCEPTED FROM A HOLDING AGENCY.
- O ASBESTOS IN THE NATIONAL DEFENSE STOCKPILE OF CRITICAL AND STRATEGIC MATERIALS WILL BE ENCLOSED OR ENCAPSULATED.
- O HANDLING, LABELLING, STORAGE AND SHIPMENT OF ASBESTOS WILL BE IN ACCURDANCE WITH FEDERAL REGULATIONS.